

SEP 13 1988

245 FREIGHT STREET - WATERBURY, CONNECTICUT 06702 - TELEPHONE (203) 575-5700 - TELEX 4436011 - FAX 203-575-7900



RDMS Docid 00100883

September 8, 1988

US EPA
Waste Management Division
HER
CAN 6
JFJ Federal Building
Boston, MA 02203

Attention: Ms. Susan Green

Subject: Soft Hammer Demonstration/Certfication

Madam:

In accordance with the Environmental Protection Agency's land disposal restrictions governing the first third scheduled wastes, MacDermid, Inc. has enclosed a soft hammer deconstration and certification as per 40 CFR 268.8 (a) (2) for EPA waste code U188.

The demonstration reflects our efforts to locate practically available treatment that affords the greatest environmental benefit. Based on our search for such treatment we have determined that:

Incineration is the best practically available treatment. (See attached decomonstration for further details).

If any further information is required, please contact me at 203-575-7947

Sincerely,

Cherrie D. Gillis

Compliance Administrator

EPA ID: CTD001164599

SOFT HAMMER DEMONSTRATION

DATE	88/8/6
CONTACT	Nancy Oldt
TREATMENT METHOD	Incineration
LOCATION	Route 322 Bridgeport, NJ EPA ID: NJD053288239
FACILITY OWNER	Rollins Envirormental

NOTIFICATION FOR WASTES RESTRICTED FROM LAND DISPOSAL FOR WHICH NO TREATMENT STANDARDS HAVE BEEN ESTABLISHED ("SOFT-HAMMER" WASTES)

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	GENERATOR'S NAME		MANIFEST NO.	<u> </u>
	GEN. EPA. ID. NUMBER		Line No. 🗌 11a	□ 11b □ 11c □ 11d
	EWR STREAM NO.L	LHAZARDOUS WASTE NUMBERS	S) L	1
	I am supplying this notice and certification to 268.7 and 268.8. I have determined that I is treatment standards for this waste are establin a landfill or surface impoundment, unless standards, and the waste is the subject of practically available and yielding the greater have supplied.	nm the initial generator of a waste subj dished or until May 8, 1990, whichever o s the waste will be land disposed in a la f a valid demonstration and certification	ect to the "soft-hammer" ccurs first, waste identified and fill or surface impound in pursuant to 40 CFR 268	provisions of 40 CFR 268.33(I). Until above is prohibited from land disposal ment meeting minimum technological i.8 and treatment, if determined to be
	"SOFT-HAMMER" WASTE	FOR WHICH NO PRACTIC R DISPOSAL IN A LANDE		
	I have made a good faith effort to loo fied above and have determined tha submitted a demonstration and certi	cate and contract with treatment and re at no practically available treatment for dication to my U.S. EPA Regional Admi on within my demonstration changes, o	covery facilities practically this waste exists. In full ad nistrator that no practically	vavailable to treat my material identi- cordance with 40 CFR 268.8, I have vavailable treatment exists. I will im-
		If this "soft-hammer" waste, identified a ached a copy of the most recent of		
	for this material was supplied	ent of the "soft-hammer" waste identified ed with my first shipment, The information rator has not invalidated my demonstra	on within the demonstratio	
	impoundment is the only practical at	hat the requirements of 40 CFR 268.8 Iternative to treatment currently availab significant penalties for submitting false	le. I believe that the inform	iation submitted is true, accurate, and
	SIGNATURE L	NAME (Print) L		DATE
			LLY AVAILABLE	
Pollins :	"SOFT-HAMMER" WAST PRIOR TO DISF II. I have made a determination that Environmental Weste Resources, In with 40 CFR 268.8 I have submitted practically available treatment exist		ENTRACE IMPO ent for the waste identification ined yields the greatest en my U.S. EPA Regional Adm I have contracted to use the	TREATMENT EXISTS DUNDMENT ed above and have contracted with invironmental benefit. In full accordance ininistrator that I have determined that he technology that yields the greatest
Pollina :	"SOFT-HAMMER" WAST PRIOR TO DISF II. I have made a determination that Environmental Waste Resources, in with 40 CFR 268.8 I have submitted practically available treatment exist environmental benefit. I will immedia by the Regional Administrator.	E FOR WHICH PRACTICA POSAL IN A LANDFILL OF there is practically available treatment to provide the treatment I have determed a demonstration and certification to not to for the material described above and	ent for the waste identification in the waste identification of the greatest entry U.S. EPA Regional Admit have contracted to use the my demonstration changes above, after the effective	ETREATMENT EXISTS DUNDMENT ed above and have contracted with vironmental benefit. In full accordance ministrator that I have determined that he technology that yields the greatest s, or if my demonstration is invalidated date of the regulation or under a new
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Pollina	"SOFT-HAMMER" WAST PRIOR TO DISF II. I have made a determination that Environmental Waste Resources, in with 40 CFR 268.8 I have submitted practically available treatment exist environmental benefit. I will immedia by the Regional Administrator. [a) This is my first shipment of demonstration, and I have Administrator. [b) This is a subsequent shipment for this material was supplied and, the Regional Administr will otherwise provide treatment) by demonstration. I believe that the information, includin submitting false information, includin SIGNATURE "SOFT-HAMMER" WAS LA III. The "soft-hammer" waste identified is therefore not subject to the certific	E FOR WHICH PRACTICAL POSAL IN A LANDFILL OF there is practically available treatment to the provide the treatment I have determed a demonstration and certification to miss for the material described above and ately notify you if any information within a strict with the soft-hammer waste, identified a attached a copy of the most recent of the "soft-hammer" waste identified with my first shipment. The information the practically available technology who the practically available techn	ent for the waste identified yields the greatest entry U.S. EPA Regional Adril have contracted to use the my demonstration changes above, after the effective at demonstration and certification. If have been met and that sich yields the greatest entry identified to make the complete. If an aware entry is a population of the most on within the demonstration and certification. If have been met and that sich yields the greatest entry identified to make the most of the most of the most of the most on within the demonstration. If have been met and that sich yields the greatest entry identified the most of the most	ETREATMENT EXISTS DUNDMENT ed above and have contracted with vironmental benefit. In full accordance ministrator that I have determined that he technology that yields the greatest s, or if my demonstration is invalidated date of the regulation or under a new dication I submitted to my Regional precent demonstration and certification on has not changed and is still correct, where the are significant penalties for UNITS OTHER THAN landfill or surface impoundment and 268.8.

_ DATE___

SIGNATURE_



245 FREIGHT STREET - WATERBURY, CONNECTICUT 06702 - TELEPHONE (203) 575-5700 - TELEX 4436011 - FAX 203-575-7900

August 14, 1989

HL 3D

AJG 2 2. 89

Regional Administrator - EPA JFK Federal Building Boston, MA 02203 MT A "T MASTE MANACEMENT BRANCH

Gentlemen:

In accordance with the Environmental Protection Agency's land disposal restrictions governing the second third scheduled wastes,

MacDermid Incorporated has enclosed a soft hammer demonstration and certification as per 40 CFR 268.8(a) for EPA waste code(s) U135.

The demonstration reflects our efforts to locate practically available treatment that affords the greatest environmental benefit. Based on our search for such treatment we have determined that:

- _____ 1. No practically available treatment exists. (See attached demonstration for further details).
- x 2. Chemical oxidation is the best practically available treatment (see attached demonstration for further details).

If any further information is required, please contact me at (203) 575-7947.

Sincerely,

Cherrie D. Gillis

Compliance Administrator

CDG:hi

SOFT HAMPER DEMONSTRATION

EXPLANATION*	エ
DATE	54/11/8
CONTACT	George Shults
TELEPHONE	ساره - 634-6194
TREATMENT METHOD	chemical
LOCATION	Hass Research Park Clavence, my
FACILITY OWNER	1.834

*For no available treatment, insert number key from Altachment 3.

For available treatment: insert the letter key from Attachment 4.

FIRST THIRD "SOFT-HAMMER DEMONSTRATION

:	Soft-Hammer Waste For Which Alternative Treatment or Recovery Has Been Located
<u>A</u>	Rotary Kiln Incineration is a practically available technology that yields the greatest environmental benefit. This waste is principally organic residues which are best destroyed by incineration.
В	Liquid Injection Incineration is a practically available technology that yields the greatest environmental benefit. This waste is principally pumpable organic residues which are best destroyed by incineration.
C	Fuels Blending is a practically available technology that yields the greatest environmental benefit. This waste has a heating value greater than or equal to 5,000 BTU per pound and can be best reused as a hazardous waste fuel.
D	A combination of Fuels Blending, and/or Rotary Kiln or Liquid Injection is a practically available technology that yields the greatest environmental benefit. This is due to the properties of my waste which may vary slightly, from one load to the next. Solid nondispersible residues will need to be incinerated; but the pumpable or dispersible portions may be blended for hazardous waste fuels usage (when the BTU's, chlorine, ash, etc. are within the required ranges); or else incinerated.
<u> </u>	Chemical Precipitation (with filtration or decanting) is a practically available technology that yields the greatest environmental benefit. This should reduce the toxicity/mobility of the hazardous constituents by reducing the toxic volume of the waste.
F	Filtration is a practically available technology that yields the greatest environmental benefit. This should reduce the toxicity/mobility of the hazardous constituents by reducing the toxic volumes of the waste.
G	Stabilization is a practically available technology that yields the greatest environmental benefit. Stabilization will reduce the mobility of the hazardous constituents of the waste. I have examined recovery and destruction technologies ; found that they were not practically available for the following reason(s):
н	Chemical oxidation is a practically available technology that yields the greatest environmental benefit. Chemical oxidation will reduce the toxicity of hazardous constituents in the waste.
This wast	e is not suitable for incineration or fuels due to:
<u>J</u>	the low percentage of hazardous organic constitutents presents, the low heating value of the waste, the high percentage of inorganic constituents present, the lack of located available capacity of incineration or fuels blending facilitie
This wast	e is not suitable for recovery due to:
N O P	The hazardous constituents are present in concentations that make recovery technologically impossible. The hazardous constituents are present in concentrations that make recovery economically infeasible. No recovery facilities were located that could treat this type of waste. No recovery facilities were located that had capacity to treat this type of waste.
Q	The treatment technology identified above is a past practice that has been

demonstrated to meaningfully reduce the toxicity and/or mobility of the waste.

Additional Comments:

ATTACHMENT 3

FIRST THIRD "SOFT-HAMMER" DEMONSTRATION
No Available Practical Alternative to Land Disposal

Explanation Of Why No Treatment Is Practically Available

I have not be described in	en able to locate practically available treatment or recovery for the waste the cover letter because, (refer to checked items, and any additional comments):
(1)	No recovery facilities have been located which will be able to recover the hazardous constituents of this waste.
	There is no safe and legal treatment or recovery operation which I can perform practically at my site that will appreciably reduce the toxicity or mobility of the hazardous constituents of the waste.
(3)	I have not been treating this waste at my site in the past, using a treatment technology which has been found to appreciably reduce the toxicity or mobility or mobility of the hazardous constituents of the waste.
(4)	Stabilization treatment will not appreciably reduce the toxicity or mobility of the hazardous constituents of this waste.
(5)	Incineration, thermal oxidation or other destruction technologies will not appreciably reduce the toxicity or mobility of the hazardous constituents of the waste.
(6)	I have examined the possibilities of recovery/recycling, incineration, other destruction technologies, and stabilization, in that order or preference, I have not been able to locate any such treatment facilities that will accept this waste.
(7)	The cost of treatment, shipment and disposal at the treatment/recovery facilities that have been located is greater than or equal to twice the cost of shipment and disposal at the RCRA landfill.
Additional Con	nments:
(8)	



245 FREIGHT STREET - WATERBURY, CONNECTICUT 06702 - TELEPHONE (203) 575-5700 - TELEX 4436011 - FAX 203-575-7900

September 7, 1988

US EPA
Waste Management Division
HER
CAN 6
JFK Federal Building
Boston, MA 02203

Attention: Ms. Susan Green

Subject: Soft Hammer Demonstration/Certification

Madam:

In accordance with the Environmental Protection Agency's land disposal restrictions governing the first third scheduled wastes, MacDermid, Inc. has enclosed a soft hammer demonstration and certification as per 40 CFR 268.8 (a) (2) for EPA waste codes F007 and F009.

The demonstration reflects our efforts to locate practically available treatment that affords the greatest environmental benefit. Based on our search for such treatment we have determined that:

Cyanide Destruction is the best practically available treatment. (See attached demonstration for futher details).

If any further information is required, please contact me at 203-575-7947.

Sincerely,

Cherrie D. Gillis

Compliance Administrator

EPA ID: CTD981069854

SOFT HAMMER DEMONSTRATION

EXPLANATION*		
DATE	88/L/6	8/31/88
CONTACT	Sandy Shugars	Todd Johnson
TREAIMENT METHOD	Alkaline Chlorination- Cyanide Destriction	Storage Facility- Broker - No treatment method available
LOCATION	12381 Schaefer Dr Detroit, MI EPA ID: MID098011992	130 Freight St Waterbury, CT 06702 EPA ID: CTD072138969
FACILITY OWNER	1. Cyanokem	2. EWR

EWR

SIGNATURE ___

FORM 2

Chande

17009

NOTIFICATION FOR WASTES RESTRICTED FROM LAND DISPOSAL FOR WHICH NO TREATMENT STANDARDS HAVE BEEN ESTABLISHED ("SOFT-HAMMER" WASTES)

(SOFT-MAININER WASTES)	
GENERATOR'S NAME Mac Dermid, Inc MANIFEST NO.	1
GEN. EPA. ID. NUMBER 1017 DI 9181 1 1016 21815 141 Line No. 1118 1116 1116	
EWR STREAM NO. 181894 HAZARDOUS WASTE NUMBER(S)	
I am supplying this notice and certification to Environmental Waste Resources, Inc. in accordance with the requirements of regulations under 4 268.7 and 268.8. I have determined that I am the initial generator of a waste subject to the "soft-hammer" provisions of 40 CFR 268.33(t treatment standards for this waste are established or until May 8, 1990, whichever occurs first, waste identified above is prohibited from land din a landfill or surface impoundment, unless the waste will be land disposed in a land fill or surface impoundment meeting minimum techno standards, and the waste is the subject of a valid demonstration and certification pursuant to 40 CFR 268.8 and treatment, if determined practically available and yielding the greatest environmental benefit, is conducted in accordance with the copy of the demonstration I am supplication.	j. Until sposal logical I to be
"SOFT-HAMMER" WASTE FOR WHICH NO PRACTICALLY AVAILABLE TREATMENT EXIS AND IS DESTINED FOR DISPOSAL IN A LANDFILL OR SURFACE IMPOUNDMENT	STS
I have made a good faith effort to locate and contract with treatment and recovery facilities practically available to treat my material fied above and have determined that no practically available treatment for this waste exists. In full accordance with 40 CFR 268.8, submitted a demonstration and certification to my U.S. EPA Regional Administrator that no practically available treatment exists. I will mediately notify you if any information within my demonstration changes, or if my demonstration is at any time invalidated by the ReAdministrator.	have II im-
(a) This is my first shipment of this "soft-hammer" waste, identified above, after the effective date of the regulation or under demonstration. I have attached a copy of the most recent demonstration and certification I submitted to my Ro Administrator.	
(b) This is a subsequent shipment of the "soft-hammer" waste identified above. A copy of the most recent demonstration and certified for this material was supplied with my first shipment. The information within the demonstration has not changed and is still coand, the Regional Administrator has not invalidated my demonstration and certification.	
"I certify under penalty of law that the requirements of 40 CFR 260.8 (a) (1) have been met and that disposal in a landfill or s impoundment is the only practical alternative to treatment currently available. I believe that the information submitted is true, accurate complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisor	e, and
SIGNATURE L	
"SOFT-HAMMER" WASTE FOR WHICH PRACTICALLY AVAILABLE TREATMENT EXIST PRIOR TO DISPOSAL IN A LANDFILL OR SURFACE IMPOUNDMENT It have made a determination that there is practically available treatment for the waste identified above and have contracte Environmental Waste Resources, Inc. to provide the treatment I have determined yields the greatest environmental benefit. In full according with 40 CFR 268.8 I have submitted a demonstration and certification to my U.S. EPA Regional Administrator that I have determined practically available treatment exists for the material described above and have contracted to use the technology that yields the greatest environmental benefit. It will immediately notify you if any information within my demonstration changes, or if my demonstration is invalided by the Regional Administrator.	d with dance ad that eatest
(a) This is my first shipment of this "soft-hammer" waste, identified above, after the effective date of the regulation or under demonstration, and I have attached a copy of the most recent demonstration and certification I submitted to my Re Administrator.	a new gional
(b) This is a subsequent shipment of the "soft-hammer" waste identified above. A copy of the most recent demonstration and certif for this material was supplied with my first shipment. The information within the demonstration has not changed and is still c and, the Regional Administrator has not invalidated my demonstration and certification.	cation orrect,
"I certify under penalty of law that the requirements of 40 CFR 268.8 (a) (1) have been met and that I have contracted to treat my war will otherwise provide treatment) by the practically available technology which yields the greatest environments benefit, as indicated demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalts submitting false information, including the possibility of fine and imprisonment."	l in my
SIGNATURE IC KOW Deel: I NAME (Print) L'Cherre Gr. 11. DATE 1971	نك
"SOFT-HAMMER" WASTE DESTINED FOR LAND DISPOSAL IN UNITS OTHER THA LANDFILL OR SURFACE IMPOUNDMENT	N
III. The "soft-hammer" waste identified above is being disposed of in a land disposal unit other than a landfill or surface impoundment is therefore not subject to the certification and demonstration requirements as applicable in 40 CFR 268.8.	and

_ DATE____

SIGNATURE_

Cyanide 7007/

NOTIFICATION FOR WASTES RESTRICTED FROM LAND DISPOSAL FOR WHICH NO TREATMENT STANDARDS HAVE BEEN ESTABLISHED ("SOFT-HAMMER" WASTES)

GENERATOR'S	
	1UMBER 1C171D1918111016121815141 Line No. □11a □11b □11c □11d
EWR STREAM	NO. LA 013839 HAZARDOUS WASTE NUMBERIS L 1 1
268.7 and 268.9 treatment stand in a landfill or su standards, and	is notice and certification to Environmental Waste Resources, Inc. in accordance with the requirements of regulations under 40 CFF. In have determined that I am the initial generator of a waste subject to the "soft-hammer" provisions of 40 CFR 268.33(I). Until Ards for this waste are established or until May 8, 1990, whichever occurs first, waste identified above is prohibited from land disposed for this waste impoundment, unless the waste will be land disposed in a land fill or surface impoundment meeting minimum technological the waste is the subject of a valid demonstration and certification pursuant to 40 CFR 268.8 and treatment, if determined to be able and yielding the greatest environmental benefit, is conducted in accordance with the copy of the demonstration I am supplying of
	AMMER" WASTE FOR WHICH NO PRACTICALLY AVAILABLE TREATMENT EXISTS S DESTINED FOR DISPOSAL IN A LANDFILL OR SURFACE IMPOUNDMENT
fied abov submitte	ade a good faith effort to locate and contract with treatment and recovery facilities practically available to treat my material identi- e and have determined that no practically available treatment for this waste exists. In full accordance with 40 CFR 268.8, I have that a demonstration and certification to my U.S. EPA Regional Administrator that no practically available treatment exists. I will im- traction on the information within my demonstration changes, or if my demonstration is at any time invalidated by the Regional ator.
	This is my first shipment of this "soft-hammer" waste, identified above, after the effective date of the regulation or under a new demonstration. I have attached a copy of the most recent demonstration and certification I submitted to my Regional Administrator.
	This is a subsequent shipment of the "soft-hammer" waste identified above. A copy of the most recent demonstration and certification for this material was supplied with my first shipment. The information within the demonstration has not changed and is still correct and, the Regional Administrator has not invalidated my demonstration and certification.
impound	tify under penalty of law that the requirements of 40 CFR 268.8 (a) (1) have been met and that disposal in a tandfill or surface ment is the only practical alternative to treatment currently available. I believe that the information submitted is true, accurate, and amaware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment
SIGNATURE	NAME (Print) DATE
"SOFT-	HAMMER' WASTE FOR WHICH PRACTICALLY AVAILABLE TREATMENT EXISTS
_	PRIOR TO DISPOSAL IN A LANDFILL OR SURFACE IMPOUNDMENT
Environr with 40 (practical environr	PRIOR TO DISPOSAL IN A LANDFILL OR SURFACE IMPOUNDMENT nade a determination that there is practically available treatment for the waste identified above and have contracted with nental Waste Resources, Inc. to provide the treatment I have determined yields the greatest environmental benefit. In full accordance DFR 268.8 I have submitted a demonstration and certification to my U.S. EPA Regional Administrator that I have determined that by available treatment exists for the material described above and have contracted to use the technology that yields the greatest benefit. I will immediately notify you if any information within my demonstration changes, or if my demonstration is invalidated agional Administrator.
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Environr with 40 (practical environm by the R	nade a determination that there is practically available treatment for the waste identified above and have contracted wattenental Waste Resources, Inc. to provide the treatment I have determined yields the greatest environmental benefit. In full accordance CFR 268.8 I have submitted a demonstration and certification to my U.S. EPA Regional Administrator that I have determined that by available treatment exists for the material described above and have contracted to use the technology that yields the greatest entitle benefit. I will immediately notify you if any information within my demonstration changes, or if my demonstration is invalidated agional Administrator. This is my first shipment of this "soft-hammer" waste, identified above, after the effective date of the regulation or under a new demonstration, and I have attached a copy of the most recent demonstration and certification I submitted to my Regional
Environment 40 (practical environment by the Richard (a) (b) (b) (c) (c) (d) (d) (d) (d) (d) (d) (d) (d) (d) (d	nade a determination that there is practically available treatment for the waste identified above and have contracted wastenental Waste Resources, Inc. to provide the treatment I have determined yields the greatest environmental benefit. In full accordance CFR 268.8 I have submitted a demonstration and certification to my U.S. EPA Regional Administrator that I have determined that by available treatment exists for the material described above and have contracted to use the technology that yields the greatest entitled benefit. I will immediately notify you if any information within my demonstration changes, or if my demonstration is invalidated egional Administrator. This is my first shipment of this "soft-hammer" waste, identified above, after the effective date of the regulation or under a new demonstration, and I have attached a copy of the most recent demonstration and certification. Regional Administrator. This is a subsequent shipment of the "soft-hammer" waste identified above. A copy of the most recent demonstration and certification or this material was supplied with my first shipment. The information within the demonstration has not changed and is still correct.
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CHEMALE D. GILLIS - Compliance Administrator MAR DERMID INCORPORATION 245 FRAGEN ST WATER BURY, CT OBDIZ EPA-10# CTD00/164599 6/20/89 10/17/19 SOL - UZ39 6/20/89 unte should be designated as U159 nuchus as very 10c 4) - UZZ6 CERT CP410 # CTD 9+106954 2/3 POOT, FOUG